

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
AMERICO VALLE-COLON	:	VIOLATIONS:
JOSE GOMEZ	:	21 U.S.C § 846 (conspiracy to distribute
ANGEL VARGAS	:	heroin -1 count)
		21 U.S.C. § 841(a)(1) (distribution of
		heroin - 1 count)

INDICTMENT

COUNT ONE

1. From at least on or about August 22, 2007, through on or about August 23, 2007, in West Conshohocken, in the Eastern District of Pennsylvania, and elsewhere, defendants

**AMERICO VALLE-COLON,
JOSE GOMEZ, and
ANGEL VARGAS**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute 100 grams or more, that is, approximately 200 grams, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

MANNER AND MEANS

It was a part of the conspiracy that:

2. Defendants AMERICO VALLE-COLON, JOSE GOMEZ, and ANGEL VARGAS agreed to sell 200 grams of heroin to an undercover police officer posing as a customer

for approximately \$15,000.

3. Defendants AMERICO VALLE-COLON and ANGEL VARGAS gave 200 grams of heroin to defendant JOSE GOMEZ so that GOMEZ could deliver the heroin to others.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants AMERICO VALLE-COLON, JOSE GOMEZ, and ANGEL VARGAS committed the following overt acts, among others, in the Eastern District of Pennsylvania on or about August 23, 2007:

1. Defendants AMERICO VALLE-COLON and ANGEL VARGAS provided approximately 200 grams of heroin to defendant JOSE GOMEZ to sell to another individual.

2. Defendants AMERICO VALLE-COLON, JOSE GOMEZ, and ANGEL VARGAS drove to the McDonald's Restaurant at 120 Moorehead Avenue in West Conshohocken, Pennsylvania (the McDonald's Restaurant).

3. Defendant JOSE GOMEZ distributed approximately 200 grams of heroin to an undercover law enforcement officer posing as a customer inside a car in the parking lot of the McDonalds Restaurant.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 23, 2007, in West Conshohocken, in the Eastern District of Pennsylvania, and elsewhere, defendants

**AMERICO VALLE-COLON,
JOSE GOMEZ, and
ANGEL VARGAS**

knowingly and intentionally distributed, and aided and abetted the distribution of, 100 grams or more, that is, approximately 200 grams, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

A TRUE BILL:

FOREPERSON

LAURIE MAGID
Acting United States Attorney